

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

NO. 1:23-cv-746-KRS-SCY

1964 PIPER COMANCHE PA-24-250,
SERIAL NUMBER 24-3660, TAIL
NUMBER N8404P,

Defendant-in-rem,

And,

LEONARD VANDENBERG, *and*
CHRISTY VANDENBERG,

Claimants.

STIPULATED DISCLAIMER, WITHDRAWAL OF CLAIM, AND RELEASE

The United States and Claimants Leonard Vandenberg and Christy Vandenberg
("Claimants") stipulate as follows:

1. Claimants hereby disclaim any right, title, and interest in the aircraft that is the *defendant-in-rem* in this action, a 1964 Piper Comanche PA-24-250, Serial Number 24-3660, Tail Number N8404P, (the "Defendant Property") and withdraw their verified claim dated January 19, 2024, on the condition that no costs or expenses be assessed against them. *See* Docs. 5 (Notice of Deficiency), 5-1 (Verified Claim). Claimants consent to the entry of judgment for the relief demanded in the complaint, Doc. 1, and waive notice of all further actions and proceedings in this matter.
2. All right, title, and interest of Claimants in the Defendant Property shall be forfeited to the United States and title thereto shall be vested in the United States.
3. The parties will bear their own costs and attorney's fees in this case.

4. The terms of this Stipulated Disclaimer, Withdrawal of Claim, and Release constitute full settlement and satisfaction of any and all claims by Claimants resulting from the incidents or circumstances giving rise to this forfeiture action.

5. Claimants release and forever discharge the United States, including but not limited to the United States Department of Justice, the U.S. Marshals Service (USMS), the Federal Bureau of Investigation (FBI), and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which Claimant have or may have against these government agencies and their employees and agents arising from, related to, or as a result of, any actions with respect to the Defendant Property.

6. Claimants shall hold harmless the United States, including but not limited to the United States Department of Justice, the USMS, the FBI, and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which they or any third parties, heirs, successors, agents, subrogees, or assigns, have or may have against these government agencies and their employees and agents arising from, related to, or as a result of, any actions with respect to the Defendant Property.

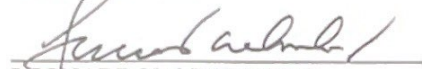
Respectfully submitted,

FOR THE UNITED STATES:

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FOR CLAIMANTS:



LEONARD VANDENBERG

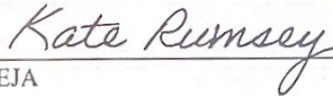
Claimant



CHRISTY VANDENBERG

Claimant

APPROVED BY:



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